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Attorneys for Defendant
ABBOTT LABORATORIES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MEIJER, INC. & MEIJER DISTRIBUTION,)	Case No. C 07-5985 CW
INC., on behalf of themselves and all others)	
similarly situated,)	<i>Related by Order to:</i>
)	
Plaintiffs,)	<i>Case No. C 04-1511 CW</i>
)	
vs.)	DECLARATION OF CHARLES B. KLEIN
)	IN SUPPORT OF ABBOTT
ABBOTT LABORATORIES,)	LABORATORIES' MOTION TO COMPEL
)	PRODUCTION OF DOCUMENTS AND
Defendant.)	INTERROGATORY RESPONSES
)	
)	Date: June 5, 2008
[caption continues next page])	Time: 2:00 p.m.
)	Courtroom 2
)	
)	The Honorable Judge Wilken

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1 ROCHESTER DRUG CO-OPERATIVE, INC.,)
on behalf of itself and all others similarly)
2 situated,)

3 Plaintiffs,)

4 vs.)

5 ABBOTT LABORATORIES,)

6 Defendant.)

7)
8)
9)
10)
11 LOUISIANA WHOLESALE DRUG)
COMPANY, INC., on behalf of itself and all)
others similarly situated,)

12 Plaintiffs,)

13 vs.)

14 ABBOTT LABORATORIES,)

15 Defendant.)
16)
17)
18)
19)
20)
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23)
24)
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26)
27)
28)

Case No. C 07-6010 CW

Related by Order to:

Case No. C 04-1511 CW

**DECLARATION OF CHARLES B. KLEIN
IN SUPPORT OF ABBOTT
LABORATORIES' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
INTERROGATORY RESPONSES**

Date: June 5, 2008

Time: 2:00 p.m.

Courtroom 2

The Honorable Judge Wilken

Case No. C 07-6118 CW

Related by Order to:

Case No. C 04-1511 CW

**DECLARATION OF CHARLES B. KLEIN
IN SUPPORT OF ABBOTT
LABORATORIES' MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
INTERROGATORY RESPONSES**

Date: June 5, 2008

Time: 2:00 p.m.

Courtroom 2

The Honorable Judge Wilken

Winston & Strawn LLP
35 W. Wacker Drive
Chicago, IL 60601-9703

1 I, Charles B. Klein, declare:

2 1. I am an attorney at law, admitted to practice in this Court for this matter. I am
3 a partner with the law firm of Winston & Strawn LLP, counsel of record for Abbott Laboratories,
4 and I am authorized to make this Declaration in that capacity.

5 2. I submit this declaration in support of Abbott's Motion to Compel Production
6 of Documents and Interrogatory Responses. The statements contained herein are based on my own
7 personal knowledge unless otherwise stated.

8 3. A true and correct copy of a portion of the Declaration of Douglas Greer,
9 previously filed in the *In re Abbott Laboratories Norvir Antitrust Litig.*, Case No. 04-1511 is
10 attached hereto as **Exhibit A**.

11 4. A true and correct copy of Plaintiffs' responses and objections to Abbott
12 Laboratories Interrogatories is attached hereto as **Exhibit B**.

13 5. A true and correct copy of Plaintiffs' responses and objections to Abbott
14 Laboratories Requests for Production is attached hereto as **Exhibit C**.

15 I declare under penalty of perjury under the laws of the United States of America that
16 the foregoing is true and correct.

17 Executed in Washington D.C, this 12th day of May, 2008.

18
19 /s/ Charles B. Klein

20 Charles B. Klein
21 Attorney for Defendant Abbott Laboratories
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